

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
Case No. 20-199

MOLLY CORDELL

Plaintiff,

vs.

CHEROKEE COUNTY, et al.,

Defendants.

**MOTION FOR CONSENT
PROTECTIVE ORDER**

The Parties hereby move for entry of an Order authorizing disclosure of North Carolina Health and Human Services records, Cherokee County Department of Social Services (“DSS”) employee personnel matters, DSS records from abuse, neglect and dependency investigations, and protected medical information pursuant to N.C.G.S. §§ 7B-302, 7B-2901 (a), 153A-98 (c), and the inherent powers of this Court. This Motion is based upon the Court file, the accompanying brief, and upon such additional evidence which may be presented at or before any hearing which may be set by the Court.

This the 11TH day of November, 2021.

s/David A. Wijewickrama

David A. Wijewickrama
Attorney for Plaintiff

s/D. Brandon Christian

D. Brandon Christian
Attorney for Plaintiff

s/Melissa Jackson

Melissa Jackson
Attorney for Plaintiff

s/ Ron Moore

Ron Moore
Attorney for Plaintiff

s/Patrick Flanagan

Patrick Flanagan
phf@cshlaw.com
Attorney for Scott Lindsay in his individual capacity

s/Mary Euler

Mary Euler
Attorney for Cindy Palmer in her individual capacity

s/Sean F. Perrin

Sean F. Perrin
Attorney for Defendants Cherokee County, Scott Lindsay in his official capacity and Cindy Palmer in her official capacity